

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

IN RE TESLA INC. STOCKHOLDER  
DERIVATIVE LITIGATION

Lead Case No.: 1:22-cv-00592-LY

(Consolidated with Case No. 1:22-cv-00611-LY)

This Document Relates To:

All Cases

**AGREED MOTION TO SET PAGE LIMITS OF PLEADINGS  
FILED IN RESPONSE TO PLAINTIFFS' CONSOLIDATED COMPLAINT**

COME NOW Plaintiffs Solomon Chau and Alvin Janklow (“Plaintiffs”) and Defendants Elon Musk, Robyn Denholm, Kimbal Musk, Ira Ehrenpreis, James Murdoch, Lawrence J. Ellison, Kathleen Wilson-Thompson, Hiromichi Mizuno, Antonio J. Gracias, Stephen T. Jurvetson, Brad W. Buss, Linda Johnson Rice, and Nominal Defendant, Tesla, Inc. (“Defendants,” together with Plaintiffs, the “Parties”) move for an extension to the page limits of the responsive pleadings. In support of this motion, the Parties state and propose as follows:

1. Defendants’ responses to the Consolidated Complaint are due on November 7, 2022.
2. Rather than file multiple motions on behalf of the various groups of defendants, which would necessitate multiple oppositions, the Parties have met and conferred, and to conserve judicial resources and promote efficiency, propose filing omnibus briefs in support and in opposition of Defendants’ motion(s) to dismiss as noted below.
3. The Parties propose that Defendants file an omnibus Motion to Dismiss not to exceed twenty-five (25) pages.

4. The Parties propose that Plaintiffs file an omnibus Opposition to Defendants' Motion to Dismiss not to exceed thirty (30) pages.
5. The Parties propose that Defendants file an omnibus Reply in support of Defendants' Motion to Dismiss not to exceed fifteen (15) pages.

**WHEREFORE**, the Parties pray for an order setting the page limits of the pleadings filed in response to Plaintiffs' Consolidated Complaint.

Dated: November 1, 2022

Respectfully Submitted,

/s/ Boris Feldman  
Boris Feldman (*admitted pro hac vice*)  
Doru Gavril (*admitted pro hac vice*)  
Jennifer Loeb (*admitted pro hac vice*)  
Rebecca Lockert (*pro hac vice pending*)  
Olivia Rosen (*pro hac vice pending*)

FRESHFIELDS BRUCKHAUS  
DERINGER US LLP  
855 Main Street  
Redwood City, California 94063  
Telephone: (650) 421-8200  
Facsimile: (212) 277-4001  
E-mail: boris.feldman@freshfields.com  
doru.gavril@freshfields.com  
jennifer.loeb@freshfields.com  
rebecca.lockert@freshfields.com  
olivia.rosen@freshfields.com

Gary Ewell  
State Bar No. 06752800  
Alithea Z. Sullivan  
State Bar No. 24072376  
EWELL, BROWN, BLANKE & KNIGHT  
LLP  
111 Congress Ave., Suite 2800  
Austin, TX 78701  
Telephone: (512) 770-4030  
Facsimile: (877) 851-6384  
E-mail: gewell@ebbklaw.com  
asullivan@ebbklaw.com  
*Attorneys for Defendants*

Dated: November 1, 2022



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Joe Kendall  
KENDALL LAW GROUP, PLLC  
State Bar No. 11260700  
3811 Turtle Creek Blvd., Suite 1450  
Dallas, TX 75219  
Telephone: (214) 744-3000  
Facsimile: (214) 744-3015  
E-mail: [jkendall@kendalllawgroup.com](mailto:jkendall@kendalllawgroup.com)

Brian J. Robbins  
Craig W. Smith  
Shane P. Sanders  
Gregory Del Gaizo  
ROBBINS LLP  
5060 Shoreham Place, Suite 300  
San Diego, CA 92122  
Telephone: (619) 525-3990  
Facsimile: (619) 525-3991  
E-mail: [brobbins@robbinsllp.com](mailto:brobbins@robbinsllp.com)  
[csmith@robbinsllp.com](mailto:csmith@robbinsllp.com)  
[ssanders@robbinsllp.com](mailto:ssanders@robbinsllp.com)  
[gdelgaizo@robbinsllp.com](mailto:gdelgaizo@robbinsllp.com)  
*Attorneys for Plaintiffs*

**CERTIFICATE OF CONFERENCE**

I certify that on October 31, 2022, I conferred with counsel for Plaintiffs, Shane P. Sanders and Gregory Del Gaizo, regarding this motion and they stated that they agree with the relief requested herein.

/s/ Doru Gavril  
Doru Gavril

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed with the Court's electronic case filing (ECF) system on November 1, 2022, which caused an electronic copy of this document to be served on all counsel of record in this matter who have registered for ECF service.

*/s/ Gary Ewell*

Gary Ewell